

THE HONORABLE BRIAN A. TSUCHIDA

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

CHRISTOPHER J. HADNAGY, an
individual; and SOCIAL-ENGINEER,
LLC, a Pennsylvania limited liability
company,

Plaintiffs,

v.

JEFF MOSS, an individual; DEF CON
COMMUNICATIONS, INC., a Washington
corporation; and DOES 1-10; and ROE
ENTITIES 1-10, inclusive,

Defendants.

No. 2:23-cv-01932-BAT

**DECLARATION OF STEVE
WYLIE**

DECLARATION OF STEVE WYLIE IN SUPPORT OF

(No. 2:23-cv-01932-BAT)

Perkins Coie LLP

1201 Third Avenue, Suite 4900
Seattle, Washington 98101-3099
Phone: +1.206.359.8000
Fax: +1.206.359.9000

1 I, Steve Wylie, declare and state as follows:

2 1. I am Steve Wylie, General Manager, Black Hat

3 2. The information contained in this declaration is true and correct to the
4 best of my knowledge, and I am of majority age and competent to testify about the
5 matters set forth herein.

6 3. In or around August 2021, Black Hat received complaints about Chris
7 Hadnagy, including complaints by Maxie Reynolds, among others. After receiving
8 these complaints, Black Hat investigated the allegations, communicated with the
9 individuals who complained about Mr. Hadnagy, communicated with Neil Wyler (who
10 was also made aware of these complaints by Maxie Reynolds), and communicated
11 with Mr. Hadnagy regarding the allegations.

12 4. After conducting this investigation, Black Hat decided to discontinue
13 Mr. Hadnagy's involvement in Black Hat as both a Trainer and Review Board
14 Member. Black Hat made this decision on its own investigation, did not rely on Def
15 Con's investigation, and did not make this decision based on public reaction to Def
16 Con's ban of Mr. Hadnagy. Black Hat removed Mr. Hadnagy solely based on its own
17 investigation and the pattern of discriminatory and bullying allegations against Mr.
18 Hadnagy.

19 5. Attached as Exhibit A is a true and correct copy of an email exchange
20 between Mr. Hadnagy and me, among others, discussing the allegations against Mr.
21 Hadnagy. In this email, I informed Mr. Hadnagy that Black Hat made the decision
22 to discontinue Mr. Hadnagy's involvement in Black Hat as both a Trainer and Review
23 Board Member, effective immediately. I also informed Mr. Hadnagy that Black Hat
24 strives to be a welcoming, inclusive and safe environment for all participants, and the
25 decision to remove Mr. Hadnagy was based on a series of credible allegations of Code
26

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1 of Conduct violations and an unacceptable pattern of harassment, hostility, and
2 retaliatory behavior by Mr. Hadnagy.

3
4 I declare under penalty of perjury under the laws of the State of Washington
5 that the foregoing is true and correct.

6
7 Dated: January 17, 2025

DocuSigned by:
Steve Wylie
CF3EFF64D2924FF...

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9 Steve Wylie
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Exhibit A

From: Wylie, Steve
Sent: Thursday, February 10, 2022 6:18 PM
To: Christopher Hadnagy; Oldenbourg, Steven; Tyra, Sarah; Timothy J Maloney
Cc: Ryan MacDougall
Subject: RE: Black Hat / Chris H

Chris,

Was just about to hit the send button on this. Our response as follows:

Chris,

I am writing to inform you that we have made the decision to discontinue your involvement in Black Hat as both a Trainer and Review Board Member, effective immediately.

Black Hat strives to be a welcoming, inclusive and safe environment for all participants. We are basing this decision on a series of credible allegations of Code of Conduct violations and an unacceptable pattern of harassment, hostility and retaliatory behavior on your part.

We do not plan to make a public statement about this decision.

Regards,
Steve

Steve Wylie
Vice President, Cybersecurity Market
Informa Tech
+1 650 284 3326

Information Classification: General

From: Christopher Hadnagy <chris@social-engineer.com>
Sent: Thursday, February 10, 2022 3:15 PM
To: Wylie, Steve <Steve.Wylie@informa.com>; Oldenbourg, Steven <Steve.Oldenbourg@informa.com>; Tyra, Sarah <Sarah.Tyra@informa.com>; Timothy J Maloney <tmaloney@maloneylawpc.com>
Cc: Ryan MacDougall <ryan@social-engineer.com>
Subject: Re: Black Hat / Chris H

Steve,

I have included my lawyer in this thread. We are formally requesting you reply to my many attempts to find out what is happening with these FALSE accusations. As you stated during our call, 1) you have no proof of the truth of these and 2) you didn't even hear these first hand.

DEF CON has decided to go a very public route and I would like to avoid that with BH regardless of your decision. This is my formal request for you to get your legal team or to give me some meeting times that we can chat.

Thank you.

Christopher Hadnagy
Chief Human Hacker
Social-Engineer, LLC.
570.234.3734
www.social-engineer.com

Are you interested in becoming the best version of YOU? Check out the Human Behavior Conference to learn how you can understand the fullness, totality and exquisite nature of human behavior. www.humanbehaviorcon.com

Grab a copy of my new book *Human Hacking: Win Friends, Influence People, and Leave Them Better Off for Having Met You* [HERE](#)!

Have you seen my TedX Talk on how we are being hacked daily? https://www.youtube.com/watch?v=9e6k_PtEXdM

From: Christopher Hadnagy <chris@social-engineer.com>

Date: Friday, January 14, 2022 at 6:30 PM

To: Wylie, Steve <Steve.Wylie@informa.com>, Oldenbourg, Steven <Steve.Oldenbourg@informa.com>, Tyra, Sarah <Sarah.Tyra@informa.com>

Cc: shane.m@innocentlivesfoundation.org <shane.m@innocentlivesfoundation.org>, Ryan MacDougall <ryan@social-engineer.com>

Subject: Black Hat / Chris H

BH Team,

I wanted to send a few quick notes and a thank you for meeting with us today. It is always after the fact that thoughts come up.

But first I wanted to reiterate that if you need to talk to some folks, Alethe Denis and Patrick Laverty (I can get you in touch with both) have been approached by Maxie, Cat and Stephanie asking them to join forces with them to bring me down. Not a joke. Alethe was even offered a position in a tv show for her loyalty. They can attest to this.

The accusations were also given to the FBI with much more serious ones and they found no evidence and dropped it and we still work with them in the ILF and I am training the BAU in this month, that would not have happened if there are any relevance to any accusation.

Are you sure there was 15 people on that call? Or was it just stated there was 15 people?

And finally, if after your investigation you find that all I said is true, I would like to formally request that you then not allow Stephanie to return as a trainer to Black Hat. This is liable and an egregious lie about me and my company and she is part of it. I would question that after your investigation when you find these are all lies and fabrications that your CoE and CoC should dictate that someone who would maliciously lie about another trainer should not be allowed to have your platform.

I hope you can look at our 16 year history of good working conditions, never having a complaint from OFFSEC days to now, and having worked with, employed and mentored many men and women in the community as well as running a nonprofit that fought revenge porn and now child abuse should help you see the true caliber of the type of person I am.

Either way, please let me know and I again apologize that as busy as we all are you have to now deal with this stuff due to personal grievances.

Stay safe this weekend.

Christopher Hadnagy
Chief Human Hacker
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Have you seen my TedX Talk on how we are being hacked daily? <https://www.youtube.com/watch?v=9e6kPtEXdM>

From: Steve.Wylie@informa.com
When: 1:30 PM - 1:55 PM January 14, 2022
Subject: Black Hat / Chris H
Location: Microsoft Teams Meeting

You don't often get email from steve.wylie@informa.com. [Learn why this is important](#)

Microsoft Teams meeting

Join on your computer or mobile app

[Click here to join the meeting](#)

Join with a video conferencing device

689585506@t.plcm.vc

Video Conference ID: 119 330 405 7

[Alternate VTC instructions](#)

Or call in (audio only)

+1 857-327-9298,,745112935# United States, Boston

Phone Conference ID: 745 112 935#

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